

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

NOV 20 2019

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Sulma Yolibet CASTILLO-Chicas
YOB: 1983 Citizenship: Honduras

Case No. M-19-2849-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 15, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324(a)(1)(A)(ii)

Knowingly or in reckless disregard of the fact that S.Y.C.C., a citizen of Honduras, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport, by foot, said alien in furtherance of such violation of law within the United States, that is, from a location in Hidalgo, Texas to the point of arrest in Hidalgo, Texas.

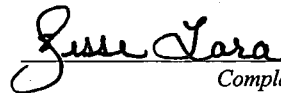
This criminal complaint is based on these facts:

On November 16, 2019, Border Patrol Agents encountered a female subject, later identified as Sulma Yolibet CASTILLO-Chicas, and a infant, later identified as S.Y.C.C., after both illegally crossed the Rio Grande River near Hidalgo, Texas. CASTILLO-Chicas claimed to be traveling along with her infant daughter. An immigration inspection was conducted and both subjects were determined to be illegally present in the United States.

✓ Continued on the attached sheet.

Approved AGSA Mike Mott
11/20/19

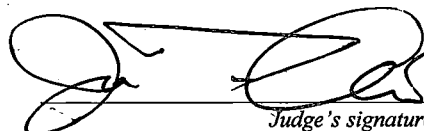
Sworn to before me and signed in my presence.

Date: 11/20/2019 - 2:27 p.m.City and state: McAllen, Texas

Complainant's signature

Jesse Lara, HSI Special Agent

Printed name and title



Judge's signature

U.S. Magistrate Judge Alanis

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

RE: Sulma Yolibet **CASTILLO-Chicas**

CONTINUATION:

The subjects were subsequently transported to the Rio Grande Valley/Central Processing Center to be processed accordingly.

On November 19, 2019, United States Border Patrol (USBP) and Homeland Security Investigations (HSI) agents interviewed Sulma Yolibet CASTILLO-Chicas upon suspicion that her claim to be a two-month-old female infant's biological mother was false. At that time, CASTILLO-Chicas admitted that she was not the biological mother of the infant. Prior to being interviewed further, CASTILLO-Chicas was read her Miranda Rights and elected to have an attorney present prior to further questioning.

Agents contacted CASTILLO-Chica's husband, Enrique Zelaya, via telephone who subsequently provided a phone number for the identified biological mother, Hilda Leticia Barahona-Lorenzo, in Honduras. Barahona-Lorenzo claimed to be the true biological mother of the infant and stated she gave the infant to CASTILLO-Chicas to bring to the United States.

The female infant was identified as S.Y.C.C.